

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

<p><b>PATRICIA JOHNSON, FAUSTO CABRERA, VELLYN ANTONELLI, CARMEN FOX, MARK ANGELOPOULOS, DIANE ANDERSON JAMES COOLEY and MARGARET COOLEY, on behalf of themselves and all others similarly situated,</b></p>	)	
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	)	
<b>Plaintiffs,</b>	)	
	)	
<b>vs.</b>	)	
	)	
	)	
<b>BAC HOME LOANS SERVICING, LP, a subsidiary of BANK OF AMERICA, N.A.</b>	)	
	)	
	)	
<b>Defendant.</b>	)	
	)	
	)	

**PLAINTIFFS' MOTION TO HOLD MOTIONS FOR PROVISIONAL CLASS  
CERTIFICATION AND PRELIMINARY INJUNCTION IN ABEYANCE  
PENDING ORGANIZATION OF MULTI-DISTRICT LITIGATION**

Massachusetts Plaintiffs Patricia Johnson, Fausto Cabrera, Vellyn Antonelli, Carmen Fox, Mark Angelopoulos, Diane Anderson, James Cooley and Margaret Cooley, (“Plaintiffs”), request the Court to hold the currently pending motions for provisional class certification (Docket No. 17) and preliminary injunctive relief (Docket No. 19) in abeyance while counsel in the transferred class action cases organize and work jointly to present a workable case management plan for the MDL to the Court. Due to the urgency of the preliminary injunctive relief to stop foreclosures while the MDL is pending, Massachusetts counsel anticipates that the proposed case management plan for the MDL will include a plan to seek injunctive relief at an early stage of the litigation. These issues will thus be addressed at the December 1, 2010 status conference.

WHEREFORE, Plaintiffs request that the Court order that Plaintiffs' motions for provisional class certification and preliminary injunctive relief are held in abeyance pending a case management plan to govern the Multidistrict Litigation.

Respectfully Submitted,  
On behalf of the Plaintiffs,

/s/ Gary Klein

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On behalf of Patricia Johnson, Fausto Cabrera, Vellyn  
Antonelli, Mark Angelopoulos, Diane Anderson, James  
Cooley and Margaret Cooley,

/s/ Michael Raabe

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DATE: November 9, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) and paper copies will be sent to those indicated as non-registered participants on November 9, 2010.

/s/ Gary Klein  
Gary Klein

**Local Rule 7.1(A)(2) Certificate**

I, Gary Klein, hereby certify pursuant to Local Rule 7.1(A)(2) that Plaintiffs' counsel consulted with counsel for Defendant before filing the foregoing motion. Defendant reserves the right to oppose the relief requested in this motion.

/s/ Gary Klein  
Gary Klein